



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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January 9, 2020

**VIA ECF**

Honorable I. Leo Glasser  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Nchewi Akpope v. City of New York, et al.,  
15 CV 6960 (ILG)(CLP)

Your Honor:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, representing defendants Sergeant Robert Hesterhagen, Police Officer Daniel Golat, and Sergeant Michael DiCecco in the above-referenced action. I write to respectfully request that the Court pose the following special interrogatories to the jury, in the event of a plaintiff's verdict on either unreasonable search of vehicle or failure to intervene as to any defendant.<sup>1</sup>

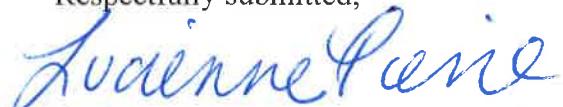
1. Did Sgt. Hesterhagen, believe, even if mistaken, that there were weapons in the car?
2. Once Sgt. Hesterhagen found a gravity knife on plaintiff, did he believe, even if mistaken, that there may be more weapons in the car?
3. Did Sgt. Hesterhagen believe, even if mistaken, that the handle was for an illegal weapon?

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<sup>1</sup> Defendants reserve their right to submit additional special interrogatories, depending on the evidence presented at trial.

Thank you for your consideration herein.

Respectfully submitted,



Lucienne Pierre  
*Senior Counsel*

cc: Ryan M. Lozar, Esq. (via ECF)